

EXHIBIT A



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[New Castle County-Civil Division]

April 23, 2007

Shane Hopkins
Delaware Correctional Center
1181 Paddock Road
Smyrna, DE 19977

RE: *Hopkins v. Pusey, et al.*
05-870 SLR

Dear Mr. Hopkins:

This letter is in response to your letter dated April 3, 2007. Defendants Pusey and Smith have responded to your previous discovery requests and are currently working on responding to your additional discovery. Defendants Pierce, Merson, and Brady have been dismissed from this action. (D.I. 73, 74). Thus they have no obligation to respond to your discovery requests and Defendants object on that basis. Regardless, in good faith, and without waiving said objection, Defendants respond as follows:

- H) Defendants object to the term “unnecessary use of excessive force” as it is speculative and calls for a conclusion. Without waiving said objection, there are none.
- J) Defendants object that this Request is vague, overly broad, and unduly burdensome. Defendants further object that this Request seeks information not relevant to the allegations in the Complaint and not reasonably calculated to lead to the discovery of admissible evidence.
- K) See Defendants response to letter (s) of Plaintiff’s first request for production of documents.
- L) Defendants refer you to inmate grievance procedures that are equally available to you as to Defendants.

With regard to your request for names of inmates housed on the tier at time of the alleged incident, Defendants direct your attention to the response contained in the letter dated November 16, 2006. The response remains the same.

Sincerely,

A handwritten signature in dark ink, appearing to read 'S. Xarhoulakos', with a stylized flourish at the end.

Stacey Xarhoulakos
Deputy Attorney General